

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TEXAS A&M UNIVERSITY,

Plaintiff,

v.

**SEATTLE SEAHAWKS, INC.,
SEATTLE PROFESSIONAL
FOOTBALL, INC., and
FOOTBALL NORTHWEST, LLC,**

Defendants.

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Civil Action No. 4:06-CV-00347

The Honorable Judge Ewing Werlein, Jr.

DECLARATION OF MICHAEL B. HUDDLESTON

I, Michael Huddleston, hereby state as follows:

1. I am currently employed by Texas A&M University ("Plaintiff" or "Texas A&M") and act as the Assistant Vice President for Business Development. I am over 18 years of age and authorized to make this Declaration on behalf of Texas A&M.

2. The following individuals, who have been identified as potential key witnesses who are likely to testify for Texas A&M, all reside in the Southern District of Texas. These individuals include both party and non-party witnesses. The currently planned subjects of their testimonies are listed below:

<u>Witness Name, Title and Address</u>	<u>Expected Testimony Subject</u>
David Chapman University Archivist Texas A&M University MS 5000	History of Use of the mark 12 TH MAN by Texas A&M University

<u>Witness Name, Title and Address</u>	<u>Expected Testimony Subject</u>
College Station, Texas 77843 (979) 845-1951	
Michael Huddleston Assistant Vice President Texas A&M University MS 1137 College Station, Texas 77843 (979) 845-1112	Trademark licensing involving 12 TH MAN Marks and damages; Enforcement efforts relating to the mark 12 TH MAN; Use by Defendants, Seattle Seahawks, of the mark 12 TH MAN
Arno Krebs, Jr. Past-Board Member for the Aggie Club 3235 Walnut Creek Court Bryan, Texas 77807 (713) 851-1319 (Cell)	Recognition and use of the mark 12 TH MAN
Miles Mark Executive Director 12 TH MAN Association Bernard C. Richardson Zone at Kyle Field, Suite 12 College Station, Texas 77843 (979) 260-7585	Extent and use of the mark 12 TH MAN by Texas A&M University
Drew Martin Director of Internet and Special Projects Brand Manager Texas A&M University P.O. Box 30017 College Station, Texas 77842-3017 (979) 458-4239	Email inquiries and complaints from the public relating to the use by Seattle of the mark 12 TH MAN

3. Substantially all of the documents, books, records and property for Texas A&M are located in the College Station area in the Southern District of Texas.

4. Texas A&M's officers and employees are located in and around College Station, Texas, in the Southern District of Texas, and all of Texas A&M's presently identified key witnesses are located in the Southern District of Texas.

5. The Texas Attorney General's office oversees any litigation involving Texas A&M.

6. College Station, Texas, is also home to the 12TH MAN Foundation which, on information and belief, is one of the most well-respected fundraising organizations in college athletics. The 12TH MAN Foundation is an integral part of Texas A&M's strong relationship with its alumni and fan base and is extremely successful at generating private donations for funding scholarships, programs, and facilities for Texas A&M.

7. The 12TH MAN Team Rewards program, in keeping with the tradition, honor and pride associated with the 12TH MAN mark, plays an important role in maintaining a high level of fan attendance at all of Texas A&M's sporting events. The program also generates both support and funding for Texas A&M's athletics through integral ties to outside sponsors including, without limitation, Best Buy, Suzuki, Bennigan's, Fitzwilly's Bar and Grille, Jason's Deli, and Papa John's Pizza, to name a few.

8. The State of Texas, and more especially, the Southern District of Texas, are focal points of Texas A&M's marketing, selling, distributing, and promotion of goods and services under the 12TH MAN Marks.

9. Defendants have caused the slogan "HOME OF THE 12TH MAN" to be placed in a prominent position on their stadium. As a result, the slogan can be seen by television cameras broadcasting a game over the air waves or on the Internet.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

By: Michael B. Huddleston

Name: Michael B. Huddleston

Title: Assistant Vice President

For Business Development

Date: April 21, 2006